

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS

WACO DIVISION

UNITED STATES OF AMERICA,	*	CRIMINAL NO. W-93-CR-046
	*	
Plaintiff,	*	S U P E R S E D I N G
V.	*	<u>I N D I C T M E N T</u>
		[18 U.S.C. 1117--Conspiracy
KATHRYN SCHROEDER (1)	*	to Murder Federal Officers;
BRAD EUGENE BRANCH (2)	*	18 U.S.C. 924(c)(1)--
KEVIN A. WHITECLIFF (3)	*	Possession of Firearm
CLIVE J. DOYLE (4)	*	During Commission of Crime
JAIME CASTILLO (5)	*	of Violence]
Defendants.	*	

COUNT ONE

[18 U.S.C. 1117]

THE GRAND JURY CHARGES:

From on or about February, 1992, and continuing thereafter up to and including the date of the filing of this Indictment, in the Western District of Texas, Defendants,

KATHRYN SCHROEDER
BRAD EUGENE BRANCH
KEVIN A. WHITECLIFF
CLIVE J. DOYLE, and
JAIME CASTILLO

did knowingly, willfully and unlawfully combine, conspire, confederate, and agree together and with each other, and with persons known and unknown to the Grand Jury, to kill, with premeditation and malice aforethought during the performance and on account of the performance of their duties, officers and employees of the Bureau of Alcohol, Tobacco and Firearms (ATF or BATF), United States Department of the Treasury and Agents of the Federal Bureau of Investigation, United States Department of Justice all

agencies of the United States as specified in Title 18, United States Code, Section 1114, including but not limited to, ATF Special Agents Steve Willis, Rob Williams, Conway LeBleu, and Todd McKeehan, all in violation of Title 18, United States Code, Section 1117.

OVERT ACTS

In furtherance of such agreement and conspiracy and to effect the objects thereof, the Defendants and their conspirators, known and unknown, committed the following overt acts, among others:

1. On February 28, 1993, in the Western District of Texas, Special Agent Steven D. Willis of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

2. On February 28, 1993, in the Western District of Texas, Special Agent Robert Williams of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

3. On February 28, 1993, in the Western District of Texas, Special Agent Conway C. LeBleu of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

4. On February 28, 1993, in the Western District of Texas, Special Agent Todd W. McKeehan of the Bureau of Alcohol, Tobacco, and Firearms was shot and killed by the conspirators while he was attempting to execute search and arrest warrants.

5. On April 19, 1993, in the Western District of Texas, Agents of the Federal Bureau of Investigation were fired upon as

they endeavored to serve arrest and search warrants. All in violation of Title 18, United States Code, Section 1117.

COUNT TWO
[18 U.S.C. 924(c)(1)]

On or about February 28, 1993, in the Western District of Texas, Defendants,

**KATHRYN SCHROEDER,
BRAD EUGENE BRANCH
KEVIN A. WHITECLIFF**

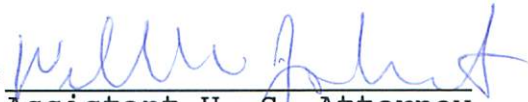
did knowingly use and carry a firearm during and in relation to the commission of a crime of violence which may be prosecuted in a court of the United States, to-wit: Conspiracy to Murder Officers and Employees of the United States, in violation of Title 18, United States Code, Sections 1117 and 1114, all in violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:



FOREPERSON

RONALD F. EDERER
UNITED STATES ATTORNEY

By: 

Assistant U. S. Attorney